

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CHARLES BURGIN,

Plaintiff,

v.

Case No.: 15-CV-0201S

BUFFALO BOARD OF EDUCATION; FORMER
BUFFALO PUBLIC SCHOOLS SUPERINTENDENT
PAMELA C. BROWN; ASSOCIATE
SUPERINTENDENT BUFFALO PUBLIC SCHOOLS
WILL KERESZIES; DIRECTOR OF SOCIAL
STUDIES BUFFALO PUBLIC SCHOOLS CHARLES
BRANDY; INTERIM SUPERINTENDENT
BUFFALO PUBLIC SCHOOLS DONALD A.
OGILVIE; BOARD OF EDUCATION MEMBER
CARL PALADINO; BOARD OF EDUCATION
MEMBER PATRICIA PIERCE; BOARD OF
EDUCATION MEMBER LAWRENCE QUINN;
BOARD OF EDUCATION MEMBER THERESA
HARRIS-TIGG; BOARD OF EDUCATION
MEMBER BARBARA SEALS-NEVERGOLD,

Defendants.

NOTICE OF MOTION

Nature of Action:	Civil Rights and Tort.
Moving Party:	Defendant Buffalo Board of Education.
Directed To:	Plaintiff Charles Burgin
Date and Time:	To be set by the Court.
Place:	United States Courthouse, 2 Niagara Square, Buffalo, New York.
Supporting Papers:	Memorandum of Law in Support of Motion to Dismiss, dated March 30, 2015.

Answering Papers: Unless otherwise ordered by the Court, Plaintiff shall file and serve any responding papers within 14 days of the service of this motion. Defendant intends to serve reply papers.

Relief Requested: An Order, pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing plaintiff's complaint together with costs and disbursements of the motion and such other and further relief as the Court deems just and proper.

Grounds for Relief: As set out in the accompanying memorandum of law.

Oral Argument: Requested.

Dated: March 30, 2015

HODGSON RUSS LLP

*Attorneys for Defendant Buffalo Board of
Education*

By: s/ Joseph S. Brown
Karl W. Kristoff
Joseph S. Brown
The Guaranty Building
140 Pearl Street, Suite 100
Buffalo, New York 14202-4040
(716) 856-4000

TO: Mr. Charles Burgin, *pro se*
22 Bennett Village Terrace
Buffalo, New York 14214